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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

LADONNA MARIE RATHEL,	)	
	)	
Plaintiff,	)	CASE NO.
	)	3:23-cv-00144-LRH-CSD
v.	)	ORDER GRANTING
	)	<b>SECOND UNOPPOSED MOTION</b>
	)	<b>FOR EXTENSION OF TIME TO FILE</b>
KILOLO KIJAKAZI, ACTING	)	<b>PLAINTIFF'S BRIEF</b>
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff, Ladonna Marie Rathel, by her attorney, moves for a second sixty (60) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed September 18, 2023.

Counsel requests this extension due to two briefing attorneys leaving Counsel's office within the last few weeks. This has necessitated a complete reorganization and reassignment of the attorney's schedules. Further, Counsel has explored the possibility of reassigning this matter to a different briefing attorney in Counsel's office prior to the current deadline, but is unable to do so due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between September 15, and November 15, 2023, staff in Counsel's office have two hundred and two (202) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement

1 negotiations, and the various other tasks which arise throughout the course of litigation. These  
2 circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current  
3 deadline. This request will not cause Defendant any undue hardship. This extension is needed to  
4 thoroughly and properly prepare the brief.  
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6 Wherefore, Plaintiff requests an extension from September 18, 2023, up to and including  
7 November 17, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's  
8 Counsel who kindly has no objection to this request.  
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10 Dated September 11, 2023.

11 Respectfully submitted,

12 /s/Hal Taylor  
13 Hal Taylor, Esq.

14  
15 IT IS SO ORDERED.

16 DATED: September 12, 2023.

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19 UNITED STATES MAGISTRATE JUDGE  
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